

EPA Region 5 Records Ctr.

ENVIRONMENTAL
SITE ASSESSMENT
of
415 East 151st Street
EAST CHICAGO, INDIANA

Prepared for:
Metal Recovery Industries (US), Inc.
415 East 151st Street
East Chicago, Indiana 46312

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TABLE OF CONTENTS

1.0	INTRODUCTION	1
2.0	PHYSICAL SETTING AND GENERAL DESCRIPTION	3
	2.2 Physical Setting	_3
	2.3 Site Description	5
	2.3.1 Office Building	7
	2.3.2 Garage	8
	2.3.3 Machine Shop	8
	2.3.4 Power House	8
	2.3.4 Power House	
	Brick	9
	2.3.6 Former Detinning Building	9
	2.3.5 Shredder Building - 2 Story Block & 3 Story Brick	•
3.0	SITE HISTORY	11
J. U	SITE HISTORY	11
	3.2 Site Operations	11
	3.2 Site Operations	13
	3.2.2 Operations since 1983	18
	J.2.2 Operations since 1903	10
4.0	FEDERAL AND STATE REGULATORY INVOLVEMENT	19
7.0		19
	4.2 CERCLA Regulatory Status	
	4.2 CERCIA REGULATORY STATUS	21
	4.3 IDEM Solid Waste Permit	22
	4.4 Jollette and South Bend Corporation	22
	4.6 Cummings Chemical Corp	22
5.0	AREAS OF ENVIRONMENTAL CONCERN	23
	5.1 Waste Disposal Areas	23
	5.1 Waste Disposal Areas	23
	5.1.2 Landfill	24
	5.1.3 Neutralization Pits	24
	5.1.5 Neutralization Pits	24
	5.2 Petroleum / Hazardous Materials Storage	24
	5.3 PCBs / Transformers	25
	5.4 Joliette and South Bend Co	25
	5.5 Drums	25
	5.6 Soil	26
	5.7 Tire Storage	26
6.0	CONCLUSIONS AND RECOMMENDATIONS	27
	6.1 Surface Soil Sampling	28
	6.1 Surface Soil Sampling	28
	6.3 Waste Classification	20
	0.5 maste classification	40
7.0	LIMITATIONS	30

TABLE OF CONTENTS (CONTINUED)

<u>FIGURES</u>	TABLE OF CONTENTS (CONTINUED)
Figure 2-1	Site Location Map
Figure 2-2	Site Layout
Figure 3-1	1930 Sanborn Map
Figure 3-2	1951 Sanborn Map
Figure 3-3	1984 Sanborn Map
APPENDICES	
Appendix A	Aerial Photographs
Appendix B	Property Deeds and <u>Real Estate Assessment and Transfer Records</u>
Appendix C	MRI Corp. Hazardous Waste Permit Application
Appendix D	Waste Classification - Detinning Muds
Appendix E	Documentation of Withdrawal of MRI Corp. Part A.
Appendix F	American Can Corp. Notification of Hazardous Waste Site
Appendix G	M & T Chemicals Corp. Notification of Hazardous Waste Site
Appendix H	EPA Soil Sampling Report
Appendix I	IDEM Inspection Reports of ASK Shredder, Inc.

Appendix J IDEM letter regarding Joliette and South Bend Corp.

1.0 INTRODUCTION

Metal Recovery Industries (US), Inc. (MRII) is currently constructing a dezincing facility for scrap galvanized steel on the eastern portion of an approximately 11.655 acre parcel of land located at 415 East 151st Street, East Chicago, Indiana. The property is currently owned by A.S.K. Shredders Corporation (A.S.K.).

Sailer Hopkins Associates, Inc. (SHA) was retained by MRII to conduct a Phase I Environmental Site Assessment (Assessment) of the A.S.K. property. The purpose of this Assessment is to provide MRII with a comprehensive description of the historical use of the property and to identify and record existing, potential or suspected conditions that may impose an environmental liability to, or restrict the use of, the property.

The scope of this investigation included a comprehensive walk through inspection of the site on June 16 and 17, 1992, and discussions with the operator of A.S.K., Mr. Nathan Apple. The investigation also included a review of local, state and federal records and a review of existing technical, legal, and historical records obtained through the Assessment and/or provided to SHA, Izc. The scope of this Assessment did not include the collection of environmental samples (i.e. soil, water, or air samples) or physical measurements to confirm or refute the accuracy of the data reviewed.

The findings presented in this report are based on SHA's professional interpretation of the available data obtained during the course of the investigation, as defined by the scope of work for this project. Additional subsurface investigations, sampling and testing may provide additional information which may modify the

1 MRI.PH1

conclusions and/or recommendations set forth herein. In providing this assessment and report, SHA does not assume responsibility for the discovery and elimination of hazards which may exist at the property which could possibly cause accidents, injury or damage.

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2

2.0 PHYSICAL SETTING AND GENERAL DESCRIPTION

2.1 Site Location

The A.S.K. Shredder Inc. property (the site) is comprised of approximately 11.655 acres of industrial land located at 415 East 151st Street, East Chicago, Indiana. The site is bordered to the south by Indiana Harbor Belt Railroad (formerly East Chicago Belt Railroad Company), to the north by residential buildings, to the east by Monarch Steel Company and Howard Industries, and to the west by Central States Manufacturing Company and the Indiana Harbor Canal. The Coordinates for the site are:

Latitude: 41° 37' 15" Longitude: 87° 28' 09"

The location of the site is provided on Figure 2-1, Site Location Map.

2.2 Physical Setting

The site is located in a highly developed area of northwestern Indiana. The majority of the area is occupied by heavy industry. The property to the south of the Indiana Harbor Belt Railroad tracks is owned by U.S. Lead. To the north of East 151st Street, is the East Chicago Housing Authority, a residential neighborhood. The soils are characterized by the U.S.Department of Agriculture, Soil Conservation Service as "Urban Soil".

3 MRI.PHI

2.3 Site Description

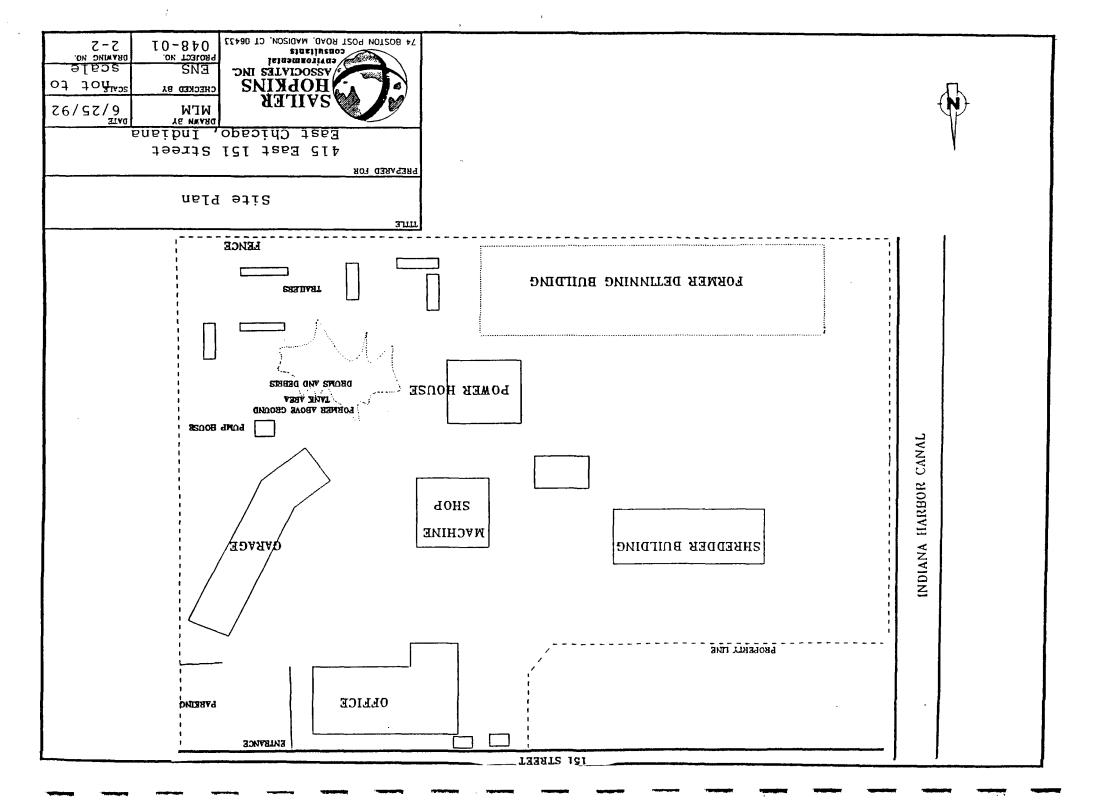
The site is comprised of approximately 11.655 acres of relatively flat industrial land which is currently occupied by nine buildings, the foundations of several demolished buildings, several above ground tank cradles, and numerous railroad sidings. A chain link fence surrounds the entire parcel of land and access is controlled by a gate at the access road to the site. A Site Plan is provided in Figure 2-2.

In addition to the buildings and other permanent structures described below, there are approximately 25,000 whole tires and approximately 6,000 cubic yards of shredded tires currently on the western portion of the site. These tires are associated with the ongoing operation of A.S.K. Shredder Inc. Several abandoned office trailers are also located in the southeastern portion of the property.

Old sewer lines and a dry well were discovered on the south side of the Office Building. A portion of the concrete pipe was exposed, broken, and covered with a metal grate revealing the old sewer drain pipe. The dry well is located approximately 6' off the southwest corner of the Office Building and the old sewer line runs east to west, parallel with the Office Building. The past use of the dry well is not known. According to Nathan Apple, all old sewer lines which drained into the Indiana Harbor Canal were sealed and all water discharges directly to the East Chicago Sanitary Sewer System.

The nine buildings on the site were inspected by SHA. Three are small brick buildings which are now vacant. They formerly

5 MRI.PH1



housed electrical equipment, gas meters, and an employee wash room. One "building" is at this time only a metal frame which is being dismantled. No areas of environmental concern were observed within the former foot print of this building. The five main buildings on the property are the office, the garage, the former power house, the former machine shop and the shredder building. The approximate locations of these buildings are shown on the site location map, Figure 2-2. The conditions observed in each building are as follows:

2.3.1 Office Building

The Office Building is a two story brick building with a full basement. The first floor of this building is currently being used by A.S.K. Shredders Inc. and MRII for office space. A portion of this floor is being converted to a laboratory area in connection with MRII's dezincing operation.

The basement is currently vacant. Reportedly, this area was previously used for a kitchen, offices and the M & T Credit Union.

The second floor of the office building is also currently vacant. It was previously used as office space.

The office building is heated by a furnace located in the basement which burns natural gas.

7

2.3.2 Garage

The garage is constructed of brick, cinder block and corrugated steel. It consists of nine bays. The garage is currently being used for the storage of pumps, fittings, metal scrap, drums of lubricating oils and other miscellaneous equipment. The floors are stained with oil and grease from normal use of the garage.

2.3.3 Machine Shop

The Machine Shop is a two story steel framed brick building. It has no basement. The building has recently been gutted and major portions of the interior have been repainted by MRII as part of the construction of the new dezincing plant. No areas of visible staining or other signs of environmental contamination were identified in this building. At the time of the inspection MRII was completing construction of spill containment trenches/sumps and the installation of process tanks for the dezincing plant. The floor is constructed of concrete and is in good condition.

The second floor was empty at the time of the inspection. The wooden floors are in poor condition.

2.3.4 Power House

The Power House is a two story steel framed building sided with corrugated Transite as shown on the 1984 Sanborn Map. A partial basement is located under the northern portion of the building. This area was flooded at the time of the inspection and could not be inspected. Reportedly the basement is often flooded by the high water table in the area. The building has recently been gutted and major portions of the interior have been repainted

8 MRI.PHI

by MRII as part of the construction of the new dezincing plant. No areas of visible staining or other signs of environmental contamination were identified in this building. It currently houses seven tanks with a total capacity of 150,000 gallons. The floor is concrete and in good condition. Containment trenches surround the tank area.

2.3.5 Shredder Building - 2 Story Block & 3 Story Brick

The building which houses the tire shredder consists of a two story cinder block and a three story brick building. The shredder system is located the cinder block building. At the time of the inspection, the shredder was not operating, nor was it on the The area beneath the shredder location and the surrounding area contained a discolored (yellow) water and oil mixture several inches deep. Drums of gear/bearing oil and other lubricants and petroleum products for the maintenance of the shredder were found along the south wall of the building. staining was found in the area of the drums. The concrete floors that were visible in the building were cracked, heavily oil stained and in poor condition. The southeastern most corner of the three story building had a puddle of oil resulting from a leaking drum of motor oil. Three tin hydrate silos were located along the south wall of the brick building.

2.3.6 Former Detinning Building

The former detinning building was located in the southwestern portion of the site parallel to the railroad tracks as shown in the Sanborn maps (Figures 3-1, 3-2 and 3-3) and aerial photographs included in Appendix A. The building was demolished in approximately in 1982. A portion of the southern wall remains

9 MRI.PHI

intact. Whole tires are stored in this area. Due to the fact that the building is demolished and no blueprints of the building were available, SHA was unable to draw conclusions to any sources of contamination from the operations in the building. Sources of contamination from the building could not be determined.

3.0 SITE HISTORY

3.1 Ownership

The ownership of the A.S.K. Shredder Inc. property was researched by SHA at the Lake County, Indiana Surveyors Office. According to the Real Estate Assessment and Transfer Records for Lake County, Indiana the property has been owned by the Metal and Thermite Corporation, American Can Company and its subsidiaries (M & T Chemical, Inc., Metal Recovery Industries, Inc., and TINCO, Inc.), Nathan Apple and Stanley Wasserman, Nasta Development Corp., Nathan Apple and Richard Stockton, and A.S.K. Shredders Corp. since 1962. Copies of the relevant Real Estate Assessment and Transfer Records for Lake County, Indiana are provided in Appendix B. According to the 1930 and 1952 Sanborn Fire Insurance Maps (Figures 3-1 and 3-2 respectively), Metal & Thermite Corporation operated on the property since at least 1930. A list of the former owners of the current property is provided in Table 3-1.

3.2 Site Operations

According to information available from a review of historical records, discussions with persons familiar with the site, and a review of aerial photographs, the site was used as a detinning plant and inorganic chemical manufacturing plant since at least 1930. The facility operated as a detinning and inorganic chemical manufacturing plant until approximately 1979. Those operations are described below.

¹The Metal Recovery Industries, Inc. referred to here is a separate and distinct entity from Metal Recovery Industries (US) Inc. for whom this Assessment has been prepared.

TABLE 3-1
PROPERTY TRANSFERS

GRANTOR	GRANTEE	DATE		
Nathan Apple Richard Stockton	A.S.K. Shredder, Inc.	10/20/88		
Nathan Apple Stanley Wasserman (S. Wasserman interest transferred to R. Stockton; N. Apple retains his interest)	Nathan Apple Richard Stockton	7/16/85		
Nasta Development Corp.	Nathan Apple Stanley Wasserman	12/27/83		
Nathan Apple Stanley Wasserman	Nasta Development Corp.	8/19/83		
TINCO, Inc.	Nathan Apple Stanley Wasserman	1/12/83		
MRI Corp.	TINCO, Inc.	5/13/82		
M & T Chemicals, Inc.	MRI Corp.	8/30/77		
Metal Thermit Corp. (American Can Successor to Metal Thermit by Merger)	M & T Chemicals, Inc.	12/31/62		

was used for prior to vacating the site. The uses of the existing buildings do not appear to have changed. However several additional buildings had been added since 1951. These include the addition of the Boiler House and the Nitrate Storage building, the demolition of the small employment building, the four fuel oil tanks (built in 1951) and the addition of the small brick gas meter house west of the office on the road.

The 1970 aerial photograph was reviewed. What was referred to as the nitrite storage building and the ammonia storage building in the 1962 MRI, Corp. site plan are connected in this photograph. Piping from the nitrite storage to the Shredder Building and the Detinning Building are visible. Scrap is stored in the inner ring of the railroad tracks. What appears to be a surface impoundment is visible in the photograph and located on the west side of the Detinning Building midway between the Canal and the Building.

The 1975 aerial photograph is unchanged from the 1970 photograph.

The 1979 photograph shows the detinning plant building intact and an area of disturbance on the western side of the building midway between the building and the Canal. The building which today is just a metal frame, was referred to as nitrite storage and is in the photograph and has piping connecting it to both the Shredder Building and the Detinning Building. Drums appear to be stored outside in an area north west of the Machine Shop and northeast of the Shredder Building and just east of the yard washroom/substation. The area inside the railroad track loop between the Detinning Building and East 151st Street appears to be used primarily for tin scrap storage. Two cranes are operating in the yard moving tin scrap. Two small undiscernible piles are located on the southeastern section of the property near the

railroad tracks. This photograph reflects the site configuration as of the approximate date of cessation of the detinning and manufacturing operations.

3.2.2 Operations since 1983

The property was purchased by Nathan Apple and Stanley Wasserman on January 12, 1983. Seven months later, it was transferred to the Nasta Development Corporation, a corporation owned by Mr. Apple and Mr. Wasserman. Four months later, the property was transferred back to Mr. Apple and Mr. Wasserman. Mr. Wasserman's interest in the property was transferred to Mr. Richard Stockton, Mr. Apple retained his interest. Mr. Apple and Mr. Stockton transferred the property to A.S.K. Shredder, Inc. on October 20, 1988.

Since 1983 the detinning building the eastern portion of the smelter building, and several other small buildings have been demolished.

ASK currently operates a tire shredding business on the property under a IDEM Solid Waste permit # 45-12.

Nathan Apple leased portions of the property to at least two other businesses during part of the ownership period. EPA records show that the Joliette and South Bend Corporation and Cummings Chemical Corp. operated at 415 East 151st Street.

4.0 FEDERAL AND STATE REGULATORY INVOLVEMENT

The public files pertaining to the A.S.K. Shredders Corp. site were obtained from the U.S. Environmental Protection Agency (EPA), Region V, and the Indiana Department of Environmental Management.

The EPA files obtained indicate that the A.S.K. Shredders Corp. property has been regulated under the Resource Conservation and Recovery Act (RCRA) as an "Interim Status" Treatment Storage and Disposal Facility (TSDF), and that the site is listed as a potential hazardous waste site and has been evaluated as a possible "Superfund" site under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA).

The Indiana Department of Environmental Management (IDEM) files indicate that the site is and/or has been regulated by the IDEM as a RCRA TSDF and that it is currently regulated as a Solid waste management facility as a tire shredder. The IDEM further indicate that two tenants of A.S.K. were the subject of IDEM regulatory activity. These companies are the Joliette and South Bend Corporation and Cummings Chemical Corp. The status of these regulatory activities, as could be discerned from a review of the public files, is discussed below.

4.1 RCRA Regulatory Status

In November 1980, MRI filed a notice a Notice of Hazardous Waste Activity with the EPA and obtained EPA Identification Number IND094761855 (Appendix C). According to the application filed by MRI, the company requested an EPA ID Number in order to accept concentrated acidic tin lacquer for recycling. Also according to the application, MRI conducted no other activities involving hazardous waste storage, treatment or disposal.

In August 1981, MRI submitted analytical data to the Indiana State Board of Health, Solid Waste Management Division, demonstrating that three of its waste streams were non-hazardous under RCRA (Appendix D). These waste streams are believed to be the only waste streams managed in MRI's tin mud ponds.

On January 29, 1985 the State of Indiana notified the City of East Chicago and U.S. EPA Region V that MRI's status as an "Interim Status" RCRA TSDF should be withdrawn. This decision was apparently based on an inspection of the facility conducted by Mr. Wakefield of the IDEM on January 7, 1982 during which IDEM determined that the activities at the MRI facility were exempt from RCRA. Copies of these documents are provided in Appendix E. Based on this information it appears that the facility is no longer considered a RCRA facility.

4.2 CERCLA Regulatory Status

Both American Can Corporation and M & T Chemicals Corp. filed EPA Notification of Hazardous Waste Site forms concerning this site. Copies of these forms are provided in Appendices F and G. Both companies reported disposal of hazardous waste on site prior to 1977. The information provided to EPA states that M & T Chemicals Corp. disposed of chromic acid in a landfill, neutralized other liquid waste in a limestone pit, and disposed of laboratory wastes in limestone pits. The location(s) of these activities is reported to be in an area southwest of the M & T Chemicals building, adjacent to the northwest corner of the current A.S.K. property. In addition, two "surface impoundments" were reported to have been operated on the site. These "surface impoundments" are believed to be the tin mud ponds associated with MRI's detinning operation.

US EPA has conducted a Preliminary Assessment of both properties. Both properties have also been ranked under the EPA's Hazard Ranking System (HRS)². Neither site scored high enough on the HRS to be listed as a "Superfund" site and only limited follow-up was recommended.

In 1986, a USEPA Field Investigation Team (FIT) contractor (Ecology and Environment, Inc.) performed limited soil sampling at the property currently owned by A.S.K. presumably as a result of the recommendations made in the Preliminary Assessment. The results of this sampling are provided in Appendix H. In general, these results show elevated concentrations of the following inorganic compounds: lead, tin, and zinc, and low levels of PCB's (Aroclor 1254) and polyaromatic hydrocarbons.

According the public file no further action has been taken with regard to this site since the completion of the soil sampling.

4.3 IDEM Solid Waste Permit

A.S.K. Shredders Corporation holds a solid waste permit for the operation of its tire shredder. The permit is currently in effect, however A.S.K. is not processing tires at this time. IDEM inspection reports are provided in Appendix I. IDEM has issued several notices of violation to A.S.K. for failing to store the tires on site in accordance with its permit conditions.

²The HRS system utilized to rank these site has been replaced by a more sophisticated system since the date of ranking these sites.

4.4 Joliette and South Bend Corporation

According to the IDEM, the Joliette and South Bend Corporation (JSBC) leases/leased a portion of the A.S.K. property. IDEM received a complaint that JSBC was receiving 5 gallon pails of "residue" from Bee Chemical and Michigan City Plastics and burning the materials in 55 gallon drums at the site (Appendix J). No information as to the specific type of material was provided and no resolution of the matter was provided in the file.

4.6 Cummings Chemical Corp.

Cummings Chemical Corp. (CCC) also apparently leased a portion of the A.S.K. property. CCC is registered as hazardous waste transporter at 415 East 151st Street, East Chicago, Indiana. No other information was available concerning this operation from the public files.

5.0 AREAS OF ENVIRONMENTAL CONCERN

Based on SHA's inspection of the A.S.K. property, a review of federal and state environmental files, and discussions with persons knowledgeable with the past/present operations at the site, the following areas of environmental concern have been identified.

5.1 Waste Disposal Areas

Several areas of waste disposal activity reportedly exist on or immediately adjacent to the property. These areas include tin mud pits, acid neutralization pits, a chromic acid disposal area, laboratory waste neutralization pits and a small landfill area. According to available information, all of the disposal activities except the tin mud pits were operated adjacent to the southwestern corner of the M & T Chemicals building. The owners of the A.S.K. property advised SHA that this location is on the property now owned by Central States Marketing Company, Inc., adjacent to the northwestern corner of the A.S.K. property.

5.1.1 Tin Mud Pits

Two unlined surface impoundments were reportedly used on the property to dry tin muds. The location of these pits is reported to be west of the former detinning building. The muds were considered non-hazardous by the State of Indiana Environmental Management Board as stated in their letter dated January 21, 1982 (Appendix D), and have reportedly been removed. Soil samples obtained from this approximate area by the USEPA FIT contractor in 1986. The results of the soil samples indicate elevated levels of lead, tin and zinc in this area.

5.1.2 Landfill

A landfill was reportedly operated on the property by M & T Chemicals. The exact location is not known, however, it is reported to be located between the former detinning plant and the former M & T plant as shown on Figure 2-4 as well as reported off the southwest corner of the M & T plant. An exposed drum was discovered during the EPA inspection in 1986.

5.1.3 Neutralization Pits

M & T Chemicals reportedly utilized limestone pits to neutralize and dispose of liquid waste material including chromic acids and laboratory wastes. M & T Chemicals Corp. and American Can reported the locations of these pits to the EPA. The location of the pits have not been fully determined but they are believed to be located off the southwest corner of the M & T manufacturing building, now owned by Central States Marketing Company, Inc.

5.2 Petroleum / Hazardous Materials Storage

5.2.1 Underground Storage Tanks

No underground storage tanks were observed on site during SHA's site inspection and no underground storage tanks are known or reported to exist on site.

5.2.2 Above Ground Storage Tanks

Four horizontal fuel oil storage tanks were previously located in the southeastern corner of the site. The tank were approximately 20,000 gallons in capacity and were supported on concrete cradles. These tanks were reportedly used to fuel the

plant boilers and their contents is believed to have been #6 or Bunker C oil. Although the tanks have been removed and are therefore no longer an environmental risk, the soils in this area are stained indicating that spills have historically occurred in this area.

Other tanks associated with the detinning process are visible in the aerial photographs and Sanborn Maps reviewed by SHA. These tanks are no longer on site. Little is known of their past use(s).

5.3 PCBs / Transformers

According to Nate Apple, three electrical transformers exist on the site: one is owned by the electric company and two are owned by ASK Shredder. According to Mr. Apple all PCB's were removed in the 1970's. PCB's formerly existed on site in transformers and could have an environmental impact on the property. Low levels of PCB's were detected in soil samples collected by the EPA FIT Team.

5.4 Joliette and South Bend Co.

The alleged activities of the Joliette and South Bend Co. as discussed in Section 3.5.1 could have an environmental impact on the property.

5.5 Drums

Drums were discovered during the SHA site inspection and the EPA inspection of September 16, 1986 in the area assumed to be the area of the former surface impoundments, as shown on Figure 2-3. Drums were also discovered by SHA personnel in the area of the former fuel oil tanks.

5.6 Soil

The soil which was exposed during the installation of the piping between the former machine shop and boiler room was blue/gray.

Soil samples collected by the EPA FIT Team resulted in elevated levels of lead, tin and zinc. The PCB and Polyaromatic hydrocarbon levels were relatively low.

Piles of fine black cinders were discovered near the area of the former above ground storage tanks and behind the Boiler Room. The composition of the cinders is not known, however they could have an environmental impact on the property.

5.7 Tire Storage

IDEM has issued several notices of violation to A.S.K. for failing to store the tires on site in accordance with its permit conditions.

6.0 CONCLUSIONS AND RECOMMENDATIONS

The site is located in a highly industrialized area of East Chicago, Indiana. It is surrounded by heavy industry on three sides. The eastern border of the property is the Indiana Harbor Canal. This canal has been characterized by the US EPA as highly polluted with heavy metals from numerous industrial discharges. Groundwater is reportedly not used for potable purposes.

The site has been used for detinning and inorganic chemical manufacturing since at least 1930. During this period of time Metal and Thermite Corporation, American Can Corp. and its subsidiaries Metal Recovery Industries, M & T Chemicals Corp. managed a wide variety of inorganic chemicals on site. Some of the by products and/or waste materials which resulted from these processes were reportedly disposed of on site. The actual locations of waste disposal activity are vague, however it appears that much of the disposal activity occurred on property adjacent to the parcel now owned by A.S.K. Shredders Corp. and not on the A.S.K. property. The owners of A.S.K. believe that the disposal areas are not on the property.

US EPA - Region V FIT contractor has shown in available reports that elevated levels of lead, tin and zinc exist on site, as well as relatively low levels of polyaromatic hydrocarbons (PAH) and PCB's. US EPA has conducted a Preliminary Assessment of the ASK property and the parcel now occupied by The Central States Marketing Company. Both properties have also been ranked under the EPA's Hazard Ranking System (HRS). Neither site scored high enough on the HRS to be listed as a "Superfund" site and only limited follow-up was recommended. EPA reported sources of contamination on the property, however, due to the geographic location and industrial nature of the area, the hazard risk determined for the

property was low to moderate. Although follow-up by the EPA was limited, SHA recommends that other sources of potential contamination be investigated and documented. SHA recommends the following sampling and analysis:

6.1 Surface Soil Sampling

SHA recommends the collection of surface soil samples from areas assumed to have an elevated metal content (i.e. assumed location of the former Tin Mud Pits, and the pipe trench between the two dezincing buildings) as well as the collection of random samples, to be analyzed for heavy metals to establish the total metal content.

Soils in the area of the above ground storage tanks were stained. Samples should be collected from this area and analyzed for Total Petroleum Hydrocarbons (EPA Method 418.1).

6.2 Transformers

PCB transformers were on site and reportedly replaced in the 1970's. Surface soil samples collected from these areas should be analyzed for PCB content. (EPA Method 8080)

6.3 Waste Classification

Drums were discovered on-site by SHA and EPA during their respective inspection. The contents of these drums are unknown and should be determined prior to disposal. Piles of black cinders were also discovered on-site during the SHA inspection. The drums and cinders should be analyzed for the complete Toxicity Characteristic Leaching Procedure (TCLP) scan and RCRA characteristics (ignitability, corrosivity and reactivity). Drums

which appear to be similar (i.e. resin like material) could be composited for classification purposes.

7.0 LIMITATIONS

The purpose of this Phase I site assessment is to identify and record existing, potential or suspected conditions that may impose an environmental liability to, or restrict the use of, the subject property.

The level of investigative effort used by SHA is consistent with SHA's understanding of the standard of care typically used by firms performing preliminary environmental site assessments at this time. SHA discussed the proposed level of effort with the MRII prior to beginning work on this project.

SHA's findings, conclusions report contains recommendations pertaining to 415 East 151st Street, East Chicago, The findings, conclusions and recommendations are based on an investigation limited to the specified scope of services. This assessment did not include an asbestos inspection. interpretation of the information obtained in this report relies on professional judgement. In certain cases, two professionals may reach different conclusions after interpreting the same data. Many of the conclusions in this report are inferred from historical information and observed conditions. This site assessment did not include soil, water, air or waste sampling. Such sampling would be needed to verify the assumptions inferred from historical information or observed conditions.

SHA's assessment and conclusions are based on the information obtained from the scope of services described above and the references documented in the assessment report. SHA relied at times on published information and the files of public agencies. SHA assumes that this information is accurate and complete. SHA interviewed certain individuals with knowledge of the past or

present use of the property. Information obtained from these interviews was verified only to extent provided in the scope of services. SHA referenced the source of information obtained from interviews which can not be independently verified. In these cases the evaluation of the reliability of the source is left to the user of this report. Information on past ownership of the property is based on SHA's review of local records. This review is not a formal title search and should not be construed as such.

No sampling, testing, excavation, subsurface investigation, borings or geophysical testing was performed during this site assessment.

This report is prepared for the exclusive use of the MRII for the sole purpose described in the beginning of this section. The findings and conclusions presented in this report may not be valid in a context other than the stated purpose of the phase I site assessment. The users of this report are cautioned that site conditions may change with time. If conditions or activities on or near the site change, the conclusions in this report may no longer be valid.

